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8   UNITED STATES DISTRICT COURT

9   NORTHERN DISTRICT OF CALIFORNIA

10   SAN FRANCISCO DIVISION

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12 | IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION | Case No. 3:23-md-03084-CRB |

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DECLARATION OF SARAH R. LONDON IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO MODIFY PRETRIAL ORDER NO. 5

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This Document Relates to:

17   All Cases

Judge: Honorable Lisa J. Cisneros
Date: February 22, 2024
Time: 3:00 PM (via Zoom)
Courtroom: G-15th Floor

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1   I, Sarah R. London, hereby declare as follows:

2   1.   I am a partner of Lieff Cabraser Heimann & Bernstein, LLP, an attorney licensed

3   in the State of California and duly admitted to practice before this Court, and appointed co-lead

4   counsel in the above captioned action.

5   2.   I submit this declaration in support of Plaintiffs' Opposition to Defendant's

6   Motion to Modify Pretrial Order No. 5.

7   3.   I have personal knowledge of the facts stated herein and, if called upon to do so,

8   could and would testify competently thereto.

9   4.   On February 7, 2024, the parties held a meet and confer during which Plaintiffs

10   proposed redaction of personal identifying information in documents produced from other sexual

11   assault litigation as a solution to protect the privacy interests of third-party plaintiffs. Counsel for

12   Uber rejected this proposal and indicated that they would instead move to modify the Pretrial

13   Order No. 5.

14   5.   Despite rejecting the redaction proposal in the above context, in a February 14,

15   2024 Production Letter Uber stated that it had "redacted information contained in these documents

16   that does not pertain to the subject matter set out in Pretrial Order No. 5, Paragraph 6(B)." A true and

17   correct copy of the February 14, 2024 Production Letter is attached as **Exhibit A.**

18   I declare under penalty of perjury under the laws of the United States of America that

19   the foregoing is true and correct.

20   Executed on this 20th day of February 2024 in San Francisco, California.

21   */s/ Sarah R. London*
Sarah R. London

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DECLARATION OF SARAH R. LONDON ISO
OPPOSITION TO MOTION TO MODIFY PTO NO. 5